

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA  
:  
- v. - :  
BORIS YUSUPOV, :  
Defendant. :  
:  
----- x

USDC SDNY  
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SUPERSEDING  
INFORMATION

S4 11 Cr. 614 (VM)

COUNT ONE

The United States Attorney charges:

From in or about December 2010, up to and including on or about November 30, 2011, in the Southern District of New York and elsewhere, BORIS YUSUPOV, the defendant, intentionally and knowingly did engage in a pattern and practice of hiring and recruiting and referring for a fee, for employment in the United States aliens knowing the aliens were unauthorized aliens, as defined in Title 18, United States Code, Section 1324a(h)(3), with respect to such employment, and, after hiring aliens for employment, intentionally and knowingly continued to employ the aliens in the United States knowing the aliens were (or had become) unauthorized aliens with respect to such employment, and did aid and abet such pattern and practice, to wit, BORIS YUSUPOV, the defendant, transported aliens who were hired by another individual to strip clubs where the aliens worked as exotic dancers, knowing the aliens to be unauthorized aliens with respect to that employment.

(Title 8, United States Code, Sections 1324a(a)(1), (a)(2),  
(f)(1), and Title 18, United States Code, Section 2.)

Preet Bharara  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(8 U.S.C. §§ 1324a(a)(1)(A), 1324a(a)(2),  
1324a(f)(1), 18 U.S.C. § 2)

PREET BHARARA  
United States Attorney.

3/21/13 Ad Superseding Fft AUSA Jonathan Cohen  
pres. Dft Boris Yusupov pres w/ attorney  
Lou. Ainslie Dft Ad Convict to  
Proceed Inf. Mo. Dft pled. Guilty  
to Cr & L B&L Conv

Atty Robert Dodge